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**Sent:** Wednesday, February 15, 2012 8:40 AM  
**To:** Berbach, Martin  
**Cc:** Mike Wade; Dakota Corey; Dana Haasz  
**Subject:** comments on draft DWR AWMP Guidebook

#### COMMENTS ON DRAFT DWR AGRICULTURAL WATER MANAGEMENT PLAN GUIDEBOOK

After reviewing the draft guidebook, our major comments relate to the need for clarity on which elements of the Water Code are required vs. those that are recommended, or given as “examples.”

The layout of the draft Guidebook utilizes a heading format that can be confusing. While it is stated on page 5 that **Bold and Underlined text (with Code section)** represents required elements, in the draft Guidebook there are areas of text following those headings that appear to be “optional.” For example, all of the items described on pages 11 through 15 are required elements of CWC Section 10826 (a), yet only the first line is **Bold and Underlined text (with Code section).** Section 10826 says that “*the plan shall do all of the following...*”, and subsection (a) says “*including all of the following...*” (emphasis added). Yet in the draft Guidebook all the text following that heading is in plain text and not **Bold and Underlined text.**

Also, guidance and recommendations included under these subsection headings are in plain text (see page 11, subsection (a)(3) for example). We are concerned this may lead agencies to believe that these items are not required. All required elements should be **Bold and Underlined text for each element of the Water Code, including subsections.**

Please note that on pages 16-18, plain text says “for example” and “explanation:” even when these elements of the Water Code sections are required, and those headings are not **Bold and Underlined text.**

It may be that when DWR develops checklists for the AWMPs (similar to those developed and utilized by DWR staff for Urban Water Management Plans) these relationships will become more apparent. It would be useful for DWR to provide these checklists as soon as possible so that agencies can utilize them in the development of their AWMPs; they can then be bound into a Final AWMP as is commonly done with UWMPs. This assists DWR staff with review of the Final AWMP by providing page number locations in the AWMP for specific Water Code requirements.

Thank you for your consideration of these comments.

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